

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	CR NO. 20-1428 SCY
	)	
vs.	)	
	)	
<b>RUTH GRANDE OLGUIN,</b>	)	
	)	
Defendant.	)	

**MOTION TO DISMISS INDICTMENT**

The United States of America moves the Court to dismiss the indictment filed in the above-styled cause, and as grounds therefore states as follows:

On April 6, 2021, Defendant entered a guilty plea to an Information charging three Class B misdemeanor violations of 16 U.S.C. §§ 703 and 707(a), that being unlawful possession of birds protected by the Migratory Bird Treaty Act. Docs. 24, 25. Also on the same date, the Honorable Steven C. Yarbrough accepted Defendant's guilty plea and sentenced her to a one-year term of probation for these crimes.

The plea agreement provides that following sentencing the United States will move to dismiss the indictment as to this defendant. Doc. 25 at 9.

WHEREFORE, the United States requests that this motion be granted and that the Court dismiss the indictment as to this defendant.

Respectfully submitted,

FRED J. FEDERICI  
Acting United States Attorney

/s/

NOVALINE D. WILSON  
Assistant United States Attorney  
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I HEREBY CERTIFY that on April 7, 2021,  
I filed the foregoing pleading electronically  
through the CM/ECF system, which caused  
counsel of record to be served by electronic  
means on this date.

/s/

Novaline D. Wilson  
Assistant United States Attorney